

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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	:	
UNITED STATES OF AMERICA	:	
	:	
-v.-	:	CONSENT PRELIMINARY ORDER OF
	:	FORFEITURE AS TO SPECIFIC_
	:	<u>PROPERTY /MONEY JUDGMENT</u>
	:	
PABLO RENATO RODRIGUEZ,	:	S1 20 Cr. 398 (GBD)
	:	
Defendant.	:	
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WHEREAS, on August 18, 2020, PABLO RENATO RODRIGUEZ (the “Defendant”), among others, was charged in a three count Superseding Indictment, S1 20 Cr. 398 (GBD) (“the “Indictment”), with conspiracy to commit wire fraud, in violation of Title 18, United States Code, Section 1349 (Count One); bank fraud conspiracy, in violation of Title 18, United States Code, Section 1344 (Count Two); and conspiracy to commit money laundering, in violation of Title 18, United States Code, Sections 1956(h) (Count Three);

WHEREAS, the Indictment included a forfeiture allegation as to Count One of the Indictment, seeking forfeiture to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), of any and all property, real or personal, that constitutes or is derived from proceeds traceable to the commission of the offense charged in Count One of the Indictment, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of the offense charged in Count One of the Indictment and, *inter alia*, the following specific property:

- a. Any and all funds in account number ending in -1396 held at Banco Promerica in the name of Pablo Rodriguez, and any and all funds traceable thereto;.
- b. 1,922,136 Guatemalan Quetzals in account number ending in -833-4 held at Banco G&T Continental in the name of Pablo Renato Rodriguez Arevalo, and any and all funds traceable thereto;
- c. Any and all funds in account number ending in -5678 held at Banco G&T Continental in the name of Pablo Renato Rodriguez Arevalo, and any and all funds traceable thereto;
- d. Any and all funds in account number ending in -1830 held at Banco G&T Continental in the name of Master Group S.A., and any and all funds traceable thereto;
- e. Any and all funds in account number ending in -3368 held at Wells Fargo Bank in the name of Gutemberg Dos Santos, and any and all funds traceable thereto;
- f. Any and all funds in account number ending in -2098 held at Bank of America in the name of Guternberg Silva Santos, and any and all funds traceable thereto;
- g. Any and all funds in account number ending in -4300 held at Bank of America in the name of Gutemberg Silva Santos, and any and all funds traceable thereto;
- h. Any and all funds in account number ending in -033-7 held at Banco G&T Continental in the name of Gutemberg Silva Dos Santos, and any and all funds traceable thereto;
- i. Any and all funds in account number ending in -190-4 held at Banco G&T Continental in the name of Gutemberg Silva Dos Santos, and any and all funds traceable thereto;
- j. Any and all funds in account number ending in -6471 held at J.P. Morgan Securities in the name of Scott D. Hughes, and any and all funds traceable thereto;

- k. Any and all funds in account number ending in -9876 held at J.P. Morgan Securities in the name of Scott D. Hughes, and any and all funds traceable thereto;
- l. Any and all funds in account number ending in -4168 held at American Express in the name of Scott D. Hughes, and any and all funds traceable thereto;
- m. Any and all contents of Safe Deposit Box 117 in the name of Scott D. Hughes at Chase Bank branch located at Newport Center and Fashion Island and associated with account number ending in -4888;
- n. Any and all funds in account number ending in -7048 held at Bank of America in the name of Scott D. Hughes, A Professional Law Corp, and any and all funds traceable thereto;
- o. Any and all funds in account number ending in -1025 held at Bank of America in the name of Scott D. Hughes, and any and all funds traceable thereto;
- p. Any and all funds in attorney trust account number ending in -6939 held at Bank of America in the name of Scott D. Hughes, A Professional Law Corp, and any and all funds traceable thereto;
- q. Any and all funds in an account held at Goldman Sachs in the name of Scott Hughes, and any and all funds traceable thereto;
- r. Any and all funds in account number ending in -0143 held at Latino Community Credit Union in the name of Cecilia D. Millan, and any and all funds traceable thereto;
- s. Any and all funds in account number ending in -3303 held at Latino Community Credit Union in the name of Cecilia D. Millan, and any and all funds traceable thereto;
- t. Any and all funds in account number ending in -9632 held at Latino Community Credit Union in the name of Cecilia D. Millan, and any and all funds traceable thereto;
- u. Any and all funds in account number ending in -0000 held at Bank of America in the name of Jackie Aguilar, and any and all funds traceable thereto;

- v. Any and all funds in account number ending in -2900 held at BBVA Compass Bank in the name of Jackie Aguilar, and any and all funds traceable thereto;
- w. Any and all funds in account number ending in -0843 held at BBVA Compass Bank in the name of Jackie Aguilar, and any and all funds traceable thereto;
- x. Any and all funds in account number ending in -5334 held at Capital One Bank in the name of Jackie Aguilar, and any and all funds traceable thereto;
- y. Any and all funds in account number ending in -8825 held at Capital One Bank in the name of Jackie Aguilar, and any and all funds traceable thereto;
- z. Any and all funds in account number ending in -2658 held at Capital One Bank in the name of Jackie Aguilar, and any and all funds traceable thereto;
- aa. Any and all funds in account number ending in -6906 held at Capital One Bank in the name of Jackie Day Services, and any and all funds traceable thereto;
- bb. Any and all funds in account number ending in -6213 held at BBVA Compass Bank in the name of Jackie Day Services, and any and all funds traceable thereto;
- cc. Any and all funds in account number ending in -7320 held at BBVA Compass Bank in the name of Jackie Day Services LLC, and any and all funds traceable thereto;
- dd. Any and all funds in account number ending in -0546 held at Wells Fargo Bank in the name of Jackie Day Services LLC, and any and all funds traceable thereto;
- ee. Any and all funds in account number ending in -7533 held at BBVA Compass Bank in the name of Jackie Day Services LLC, and any and all funds traceable thereto;
- ff. Any and all funds in account number ending in -7800 held at BBVA Compass Bank in the name of Jackie Day Services LLC, and any and all funds traceable thereto;

- gg. Any and all funds in account number ending in -8337 held at Chase Bank in the name of Master Tax Group, Inc., and any and all funds traceable thereto;
- hh. Any and all funds in account number ending in -6311 held at Wells Fargo Bank in the name of Yeimi M. Rodriguez, and any and all funds traceable thereto;
- ii. Any and all funds in account number ending in -9928 held at Wells Fargo Bank in the name of Yeimi M. Rodriguez, and any and all funds traceable thereto;
- jj. Any and all funds in account number ending in -2371 held at Chase Bank in the name of Yeimi Rodriguez, and any and all funds traceable thereto;
- kk. Any and all funds in account number ending in -8118 held at U.S. Bank in the name of Master Commerce Industries, and any and all funds traceable thereto;
- ll. Any and all funds in account number ending in -0482 held at Wells Fargo Bank in the name of Master Tech Developments Inc. d/b/a Global Tech Management, and any and all funds traceable thereto;
- mm. All right, title, and interest of the defendants in the real property located at 117 Amber Sky, Irvine, CA 92618, with all improvements, appurtenances, and attachments thereon;
- nn. All right, title, and interest of the defendants in the real property located at 10031 White Mulberry Drive, Las Vegas, NV 89148, with all improvements, appurtenances, and attachments thereon;
- oo. All right, title, and interest of the defendants in the real property located at 7744 Chesterbrooke Drive, Greensboro, NC 27455, with all improvements, appurtenances, and attachments thereon;
- pp. All right, title, and interest of the defendants in the real property located at 1905 Evergreen Ave, Raleigh, NC 27603-3009, with all improvements, appurtenances, and attachments thereon;
- qq. A 2015 Mercedes Benz G3 AMG Wagon bearing license plate FLV4223; and

rr. A 2018 Mercedes Benz CLA Sedan bearing license plate PLA5469;

((a) though (rr) the "Indictment Property")

WHEREAS, on or about September 23, 2021, the Government filed a Forfeiture Bill of Particulars giving notice that the following property, *inter alia*, was subject to forfeiture as a result of the offense described in Count One of the Superseding Indictment:

- a. \$999,936.22 formerly held in escrow by Insured International Aircraft Title Service LLC for the Gulfstream Jet with Tail Number N370Z and Serial Number 2082, including any and all accrued interest;
- b. Any and all funds and cryptocurrency in Coinbase Account Number 59af55a2ecdcd033e5f2505, in the name of Margarita Cabrera and any accounts associated with the email account negociomundialmc@gmail.com;
- c. Any and all funds and cryptocurrency in Coinbase Account Number ChCAwtnszlbVLuk0rVFSgHTr9sPqb1wp5, in the name of Orlando Velasco Ponce and any accounts associated with the email account velascoponceorlando@gmail.com;
- d. Any and all funds and cryptocurrency in Coinbase Account Number 5478f5ee278b5ed913000001, in the name of Scott D. Hughes and any accounts associated with the email account scott@scotthugheslaw.com;
- e. Downey Federal Credit Union Debit Card Number 4636920021180271 and any and all funds held at Downey Federal Credit Union in the name of Pablo Renato Rodriguez Arevalo;
- f. HSBC Bank Debit Card Numbers 5325617908512864 on deposit in HSBC Bank USA, NA., and any and all funds held at HSBC Bank USA, NA. in the name of Pablo Renato Rodriguez Arevalo;
- g. HSBC Bank Debit Card Numbers 5451984690133663 on deposit in HSBC Bank USA, NA., and any and all funds held at HSBC Bank USA, NA. in the name of Pablo Renato Rodriguez Arevalo;

- h. Any and all funds held in Santander Bank, N.A., in Account Number 60603308104 in the name of Cecilia Dennys Millan Lara and/or Cecilia Millan;
- i. Any and all funds held in Santander Bank, N.A., in Account Number 60603233279, in the name of Cecilia Dennys Millan Lara and/or Cecilia Millan;
- j. Any and all funds held in Bank of America N.A., in Account Number 898104477770, in the name of Coaching Business Corporation;
- k. Any and all funds held in Bank of America, N.A., in Account Number 4815820207851195 held in the name of Yeimi M. Rodriguez;
- l. Citibank, N.A. Debit Card Number 4269380003786542 on deposit in Citibank, N.A., and any and all funds held at Citibank, N.A. in the name of Pablo Renato Rodriguez Arevalo
- m. Citibank, N.A. Debit Card Number 4100390148018878 on deposit in Citibank, N.A., and any and all funds held at Citibank, N.A. in the name of Pablo Renato Rodriguez Arevalo
- n. Any and all items of value, seized on or about May 25, 2021, from Jorge Alejandro Rodriguez, from the residence located at 9044 Charloma Drive, Downey, CA 90240, including but not limited to the following:
 - 1. One Black Apple iPhone Xs, containing Serial No. C39YC9Z7KPFP;
 - 2. One Black Apple iPhone X, containing Serial No. G6TWH04FJCL8;
 - 3. One Space Grey Apple iPhone 11 Pro, containing Serial No. C39ZX3YLN6XR;
 - 4. One Apple iPhone in black rubber "Mophie" case, containing Serial No. F73SG8HPHG6W;
 - 5. One Black Samsung cell, containing Serial No. R95N70NZ6KV;
 - 6. One silver Apple MacBook w/ power cord, containing Serial No. C02ZY331LVDD;
 - 7. One silver Apple MacBook w/ power cord, containing Serial No. C02WGB8UHV2L;
 - 8. One silver Apple MacBook w/ power cord, containing Serial No. C1ML95B7DTY4;
 - 9. One SanDisk Portable SSD (flash drive), containing Serial No. BV160525253714;

10. One Black SanDisk thumb drive, containing Serial No. BM130523461B;
 11. One White Data Traveler thumb drive;
 12. One Blue Kingston thumb drive, containing Unique Identifier 04615-342;
 13. One Red Transcend thumb drive, containing Serial No. 5067985449;
 14. One Black leather case thumb drive;
 15. One SD card in Samsung adapter, containing Serial No. KN9NCWYAC604;
 16. One SD card in Photo Fast, containing the unique identifier ATWSJASC8JO;
 17. One Gray iPad
containing Serial No. F9FT5CPCFLML;
 18. One Samsung tablet, containing Serial No. R520212N82M;
 19. One Black notebook;
 20. One AirBit card and Card Holder;
 21. One Box of Checks;
 22. One Topps Kobe Bryant #138 Basketball Card;
 23. One Panini Prizm Kobe Bryant #8 Basketball Card;
 24. One Panini Prizm Kobe Bryant #15 Basketball Card;
 25. One Panini Donruss Optic LeBron James #94 Basketball Card;
 26. One Panini Prizm LeBron James #129 Basketball Card;
 27. One Pokémon Charizard Trading Card;
 28. One Rose gold colored watch w/ black face;
 29. Miscellaneous Documents containing the wording "Bitcoin";
 30. Miscellaneous Documents;
- o. Any and all items of value, seized on or about August 18, 2020, from Pablo Renato Rodriguez, from the residence located at 117 Amber Sky, Irvine, CA 92618, including but not limited to the following:
1. \$896,483.00 in United States currency;
 2. One watch Displaying the Name Bulova Marine Star;
 3. One watch Displaying the Name Boss;
 4. One watch Displaying the Name Bulgari;
 5. One watch Displaying the Name Guess;
 6. One watch Displaying the Name Breitling Bentley;
 7. One watch Displaying the Name Emporio Armani;
 8. One watch Displaying the Name Hermes Paris;
 9. One watch Displaying the Name Tissot 1853;
 10. One watch Displaying the Name Kenneth Cole;
 11. One watch Displaying the Name Patek Philippe;
 12. One watch Displaying the Name Vacheron Constantin;
 13. One watch Displaying the Name RADO;

14. One watch Displaying the Name IWC Shaffhausen;
15. One Black Colored watch with Clear Rectangular Face;
16. One Rose Gold Colored watch with Circular Spinning Face;
17. One watch Displaying the Name Hublot;
18. One watch Displaying the Name Cartier;
19. One watch Displaying the Name Luminor Panerai;
20. One Gold Colored Bracelet;
21. One Silver Colored Bracelet with Gold Colored Stripe Down the Middle;
22. One Gold Colored Ring with Clear Stones;
23. Two Gold Colored Earrings in a Box Labeled Bulgari;
24. One Apple iPhone - Black with Screen Protector;
25. One Apple iPhone XR, containing Serial No. GQTCH81BKXKQ and IMEI No. 356439109235358;
26. One Apple iPhone- Black without Screen Protector;
27. One iPhone XS Max , containing IMEI No. 357272091487599;
28. One Apple iPhone- Rose Gold Colored;
29. One iPhone 11 Pro, containing IMEI No. 353249102374770;
30. One Apple iPhone- White Colored;
31. One iPhone 11 Pro, containing Serial No. DNDPZN0ARN6XY and containing IMEI No. 353239103737752;
32. One SM Duty Free External Hard Drive;
33. One Apple iPhone-White Colored, with a Cracked Screen;
34. One iPhone 11 Pro, containing Serial No. C39ZP031N6XY and IMEI No. 353242103815685;
35. One Apple iPhone- Space Grey;
36. One iPhone 11 Pro, containing Serial No. F17Z901NN6XX and IMEI No. 353234100064680;
37. One Apple iPhone-Green Colored;
38. One iPhone 11 Pro containing IMEI No:353245101914327;
39. One HP Tower – Black;
40. One HP Tower – Black;
41. One HP Tower – Silver;
42. One HP Tower – Black;
43. One Red Sports Coat;
44. One Green and Blue Sports Coat;
45. One Blue Sports Coat with Blue Lapels;
46. One Blue Velvet Sports Coat with Black Lapels;
47. One Black Sports Coat with Pants;
48. One Bag of Airbit Pins; and
49. Miscellaneous Documents;

p. Any and all items of value, seized on or about August 18, 2020, from Cecilia Millan, from the 7744 Chesterbrooke Drive, Greensboro, NC 27455, including but not limited to the following:

1. \$29,402.00 in United States currency;
2. One Gray Apple MacBook located upstairs bedroom, containing the unique identifier WQ841ATV1AX;
3. One Gray Apple MacBook located upstairs office, containing the unique identifier C17GQ11YDV13;
4. One Gray Apple MacBook located upstairs bedroom left corner, containing the unique identifier C02XC78FJHC8;
5. One Gray Apple MacBook located upstairs bedroom right side, containing the unique identifier FVFC9GKKL40Y;
6. One Gray Apple MacBook located upstairs office, containing the unique identifier CO2LVLZMF5V7;
7. One Gray Apple iMac located in the upstairs office;
8. One Gray Apple iMac located in the downstairs office;
9. One Apple iPad located upstairs office, containing the unique identifier DMPWJ0NSJ2D4;
10. One Samsung Galaxy S8+ (SM-G955U), containing the unique identifier R28J42TE2XM;
11. One Samsung Galaxy ON5 SM-G550T, containing the unique identifier RV8H81FP61F;
12. One Samsung Galaxy Note 3 (SM-N900A), containing the unique identifier R38DC0BLZHA;
13. One Samsung Galaxy S8+ (SM-G955U), containing the unique identifier R28J43RWBVY;
14. One Samsung Galaxy S3 (SGH-I747), containing the unique identifier R31D501J6SB;
15. One Samsung Galaxy S5 (SM-G900T), containing the unique identifier RV8F619ZA1V;
16. One Apple iPhone 7 Plus, containing the unique identifier FYMTW6T3HG04;
17. One Apple iPhone IPHONE XS Max, containing the unique identifier C39XM1LLKPHK;
18. One Apple iPhone, containing the unique identifier 5C F4RM6AJ7FFHG;
19. One Apple iPhone 11 Pro Max, containing the unique identifier FK2ZKEC9N70C;
20. One Apple iPhone IPHONE XS Max, containing the unique identifier FFMKY2HDKPHJ;

21. One Samsung Galaxy S7 Edge (SM-G935T), containing the unique identifier RF8H31X4KDY;
 22. One iPhone8 Plus, containing the unique identifier FD6W94M5JCM4;
 23. One iPhone8 Plus, containing the unique identifier GHJYD3CHJCM2;
 24. One Kingston Data Traveler G4 Thumb Drive, containing the unique identifier C860008AE288F1C0690300F;
 25. One Neustar Thumb Drive, containing the unique identifier AA04012700011546;
 26. One Kingston MobileLite G4 MicroSD to USB Adapter, containing Serial No.: 201404081410;
 27. One Scandisk Portable SSD (SDSSDE60-500G), containing Serial No.: 182933401936;
 28. One Lexar Thumb Drive, containing the unique identifier AAYCA1SE46W9EMGB;
 29. One Kingston DTSE9 Thumb Drive (A), containing the unique identifier E0D55E55CA30C33079884AF5;
 30. One Kingston DTSE9 Thumb Drive (B), containing the unique identifier 1C1B0D03C47BC330790F1C72;
 31. One Scandisk Gold MicroSD Card, containing Serial No. 2018031900000130;
 32. Scandisk Silver MicroSD Card, containing Serial No. 2018031900000132 ;
 33. Various Money Counters;
 34. Miscellaneous Documents;
- q. 37.28287781 in BTC, located in digital wallet with the public address ending in DbgT, seized from Jorge Alejandro Rodriguez, on or about May 25, 2021;
- r. 0.00098384 in BTC, located in digital wallet with the public address ending in Y2tQ, seized from Jorge Alejandro Rodriguez, on or about May 25, 2021;
- s. 0.0074991 in BTC, located in digital wallet with the public address ending in sU6j, seized from Jorge Alejandro Rodriguez, on or about May 25, 2021;
- t. 1.86277569 in BTC, located in digital wallet with the public address ending in JdLA, seized from Jorge Alejandro Rodriguez, on or about May 25, 2021;

- u. 1.834058959985846 in ETH, located in digital wallet with the public address ending in 8739, seized from Jorge Alejandro Rodriguez, on or about May 25, 2021;
- v. 1,322.98963846 in BTC, located in multiple digital wallets, seized from Pablo Renato Rodriguez, on or about January 15, 2021;
- w. Any and all items of value, seized on or about August 18, 2020, from Gutemberg Dos Santos, from the residence located at Ocean Reef Islands Marina, PH Garden, Piso 3, Apartamento 23, Panama City, Panama, including but not limited to the following:
 - 1. One Grey Apple MacBook Air, Unique Identifier C02V30QTHH21;
 - 2. One Grey Windows Tablet, containing the unique identifier 1724 128GB 041740563353;
 - 3. One Grey Apple tablet in black case, containing the unique identifier DLXVP0NAJ294;
 - 4. One Black Apple iPhone with a Broken Screen;
 - 5. One Rose Gold Apple Iphone, Unique Identifier F17ZV6KKN6XQ;
 - 6. One Green Apple iPhone in blue case, containing the unique identifier F17ZV6KKN6XQ;
 - 7. One Black Samsung phone in a clear case;
 - 8. One Black MOTO smart phone, containing the unique identifier XT1789-06;
 - 9. One Silver Kingston Storage Device DT 50 (16GB), containing the unique identifier C7052-303A01LP;
 - 10. One Silver Kingston Storage Device DT 50 (16GB), containing the unique identifier C7538722-5V;
 - 11. One Silver Kingston Storage Device DT 50 (16GB), containing the unique identifier C7052-303A01LF;
 - 12. One Silver Kingston Storage Device DT 50 (16GB), containing the unique identifier OS 7636722 5V;
 - 13. One Black Maxell Storage Device (64GB);
 - 14. One Blue Delkin Devices Power Storage Device (64GB), containing the unique identifier TPDN003463291;

15. One Silver Blockchain Business Board B3 Storage Device;
 16. One Black/Red SanDisk Cruzer Blade Storage Device (8GB), containing Serial No. BI141124450B;
 17. One Black/Red SanDisk Cruzer Blade Storage Device (8GB), containing Serial No. BI160225183V;
 18. One Black Apple Watch Series 3, 42 mm with an Aluminum Case;
 19. One White/Silver Apple Watch;
 20. One SAFEWISE Cryptocurrency Device, containing CNPJ No. 26.264 220;
 21. One LUXOR 300 NIVEL-700 Pacific Hills;
 22. One Black/Grey Louis Vuitton wallet;
 23. One Bag containing SIM Cards and Business Cards.
 24. One Blue ZOOM H1n Handy Recorder;
 25. One Rose gold Apple iPhone;
 26. One White Apple iPhone, containing the unique identifier C39XQ0SVKPFV;
- x. \$25,590.91 in United States currency formerly on deposit in Sun Trust Bank Account Number 1000258838316, held in the name of Lady Elite Empire Inc.;
 - y. \$454,175.32 in United States currency formerly on deposit in Bank of America Account Number 3250-8374-4958 (the "4958 BOA Account"), held in the name of AZ International Processing, Inc d/b/a Digital Wallets Services (the "4958 BOA Account Funds");
 - z. \$27,384.16 in United States currency formerly on deposit in Bank of American Account Number 3250-5909-9145, held in the name of Pablo Rodriguez;
 - aa. \$35,912.58 in United States currency formerly on deposit in HSBC Bank Account Number 278169945, held in the name of Pablo Renato Rodriguez Arevalo;
 - bb. 2.03411411 in BTC, located in multiple digital wallets, which was seized from Margarita Cabrera, on or about August 18, 2020;

- cc. 0.0006 in BTC, located in digital wallet with the public address ending in KuMH, which was seized from Margarita Cabrera, on or about August 18, 2020;
- dd. 0.00145808 in BTC, located in digital wallet with the public address ending in czzq, which was seized from Margarita Cabrera, on or about August 18, 2020;
- ee. 0.00084039 in BTC, located in digital wallet with the public address ending in 7fGB, which was seized from Margarita Cabrera on or about August 18, 2020;
- ff. 58.71392861 in BTC, located in multiple digital wallets, which was seized from Pablo Renato Rodriguez, on or about August 18, 2020;
- gg. 0.01457169 in BTC, located in digital wallet with the public address ending in aHkT, which was seized from Pablo Renato Rodriguez, on or about August 18, 2020;
- hh. Any and all items of value, seized on or about August 18, 2020, from Scott Hughes, from the residence located at 620 Newport Center Dr, Newport Beach, CA 92660, including but not limited to the following:
 - 1. One Apple MacBook Air, containing Serial No. C02Z29S3LYWG;
 - 2. One Apple iPhone containing One Lens Camera on the Back;
 - 3. One Apple iPhone, Two Lens Camera on Back;
- ii. Any and all items of value, seized on or about August 18, 2020, from Margarita Cabrera, from the residence located at 100 Gingerleaf Ln, Oviedo, FL 32765, including but not limited to the following:
 - 1. One White Apple iPhone SEMKCMZLL/A, containing Serial No. cfwcp7y7plk0;
 - 2. One Brown Apple iPhone11 Pro, MWCUSLL/A,0, containing Serial No. c39274hmney;
 - 3. One Airbit Sash Scarf;
 - 4. One Airbit medal;
 - 5. One Green ledger;
 - 6. One Apple Macbook Pro;

7. Multiple Books;
8. One Thumbdrive;
9. One Special ledger;
10. One Samsung Galaxy 5s plus, containing Serial No. sm-g955u;
11. One T-mobile SIM card;
12. Miscellaneous Documents containing the wording Sleeve Biiy Me
13. Multiple Airbit notes and scribes;
14. One Samsung Laptop, containing the Serial No. sm-g955u x16-96072;
15. One Electric pad;
16. One Mobile USB Drive, containing the unique identifier dpz3rg8s;
17. One Samsung phone;
18. One Scandisk card;
19. One Hp Laptop, containing the unique identifier 7265ngw;
20. One Leder Flash Drive;
21. One Sim Card;
22. Miscellaneous Airbit promo items;
23. One Galaxy 10e, containing the unique identifier sm-a-a102u;
24. One USB Thumb Drive;
25. One Scandisk 64gb;
26. One Micro SD card;
27. One Pnv-64gb drive;
28. One Airbit Thumb Drive;
29. Miscellaneous paperwork;
30. Various Notebooks and Ledgers;
31. Various Airbit promo items;

(a. through ii, collectively, the “First BP Property”);

WHEREAS, the Government seized an additional \$27,384.16 from the 4958 BOA Account (together with the 4958 BOA Funds, the “Seized Funds”);

WHEREAS, on or about October 31, 2022, the Government filed a second Forfeiture Bill of Particulars giving notice that the below listed property is subject to forfeiture as a result of the offenses described in Counts One and Three of the Superseding Indictment, as alleged in the forfeiture allegation, included the following:

- a. 499.9993 in BTC, located in digital wallet with the public address ending in 4p2yZ, which was seized by the Government on or about October 25, 2022;
- b. 499.9993 in BTC, located in digital wallet with the public address ending in iWd6, which was seized by the Government on or about October 25, 2022;
- c. 499.9995 in BTC, located in digital wallet with the public address ending in dgDTu, which was seized by the Government on or about October 25, 2022;
- d. 499.9995 in BTC, located in digital wallet with the public address ending in rE713, which was seized by the Government on or about October 25, 2022;
- e. 499.9994 in BTC, located in digital wallet with the public address ending in 4Zi9Y, which was seized by the Government on or about October 25, 2022;
- f. 500.00 in BCH, located in digital wallet with the public address ending in t4x85, which was seized by the Government on or about October 25, 2022;
- g. 500.00 in BCH, located in digital wallet with the public address ending in 9zajs, which was seized by the Government on or about October 25, 2022;
- h. 500.00 in BCH, located in digital wallet with the public address ending in nrl82s, which was seized by the Government on or about October 25, 2022;
- i. 500.00 in BCH, located in digital wallet with the public address ending in wah3r, which was seized by the Government on or about October 25, 2022;
- j. 500.00 in BCH, located in digital wallet with the public address ending in 49tqg, which was seized by the Government on or about October 25, 2022;
- k. 500.00 in BCH, located in digital wallet with the public address ending in 0jwv5, which was seized by the Government on or about October 25, 2022;
- l. 500.00 in BCH, located in digital wallet with the public address ending in ssqu5, which was seized by the Government on or about October 25, 2022;
- m. 500.00 in BCH, located in digital wallet with the public address ending in wcvnw, which was seized by the Government on or about October 25, 2022;
- n. 500.00 in BCH, located in digital wallet with the public address ending in lgpttl, which was seized by the Government on or about October 25, 2022;

- o. 500.00 in BCH, located in digital wallet with the public address ending in jzqce7, which was seized by the Government on or about October 25, 2022; and
- p. 500.00 in BCH, located in digital wallet with the public address ending in t6ddk, which was seized by the Government on or about October 25, 2022.

(a. through p., collectively, the “Second BP Property”);

WHEREAS, the Government identified the following real property constituting proceeds traceable to the offense charged in Count One of the Indictment: A single family residence comprised of: (A) Lot 46 of Tract No. 17028, in the city of Irvine, County of Orange, State of California, as per Map recorded in Book 936 Pages 1 through 28 inclusive of Maps, in the Office of the County recorder of said County and commonly described as 117 Amber Sky in the City of Irvine, California 92618, Assessor’s Parcel Number 586-051-37 (the “Irvine Property”, together with the Indictment Property, First BP Property, Seized Funds, and Second BP Property, the “Specific Property”);

WHEREAS, on or about March 8, 2023, the Defendant pled guilty to Count One of the Indictment, pursuant to a plea agreement with the Government, wherein the Defendant admitted the forfeiture allegation with respect to Count One of the Indictment and agreed to forfeit to the United States, Title 18, United States Code, Section 981(a)(1)(C) and Title 28 United States Code, Section 2461(c): (i) a sum of money equal to \$65,000,000.00 in United States currency, representing proceeds traceable to the commission of the offense charged in Count One of the Indictment; and (ii) all right, title, and interest of the Defendant in the Specific Property;

WHEREAS, the Defendant consents to the entry of a money judgment in the amount of \$65,000,000.00 in United States currency, representing the property involved in the commission of the offense charged in Count One of the Indictment;

WHEREAS, the Defendant further consents to the forfeiture of all of his right, title, and interest in the Specific Property, as proceeds traceable to the offense charged in Count One of the Indictment;

WHEREAS, the Defendant admits that, as a result of acts and/or omissions of the Defendant, the proceeds traceable to the offense charged in Count One of the Indictment cannot be located upon the exercise of due diligence, with the exception of the Specific Property; and

WHEREAS, pursuant to Title 21, United States Code, Section 853(g), and Rules 32.2(b)(3), 32.2(b)(6), and 32.2(c) of the Federal Rules of Criminal Procedure, the Government is now entitled, pending any assertion of third-party claims, to reduce the Specific Property to its possession and to notify any person who reasonably appears to be a potential claimant of their interest therein;

IT IS HEREBY STIPULATED AND AGREED, by and between the United States of America, by its attorney Damian Williams, United States Attorney, Assistant United States Attorneys Kiersten A. Fletcher, Cecilia E. Vogel, and Samuel Raymond, and the Defendant PABLO RENATO RODRIGUEZ, and his counsel, Peter Katz, Esq., that:

1. As a result of the offense charged in Count One of the Indictment, to which the Defendant pled guilty, a money judgment in the amount of \$65,000,000.00 in United States

currency (the "Money Judgment"), representing the proceeds traceable to the offense charged in Count One of the Indictment, shall be entered against the Defendant.

2. As a result of the offense charged in Count One of the Indictment, to which the Defendant pled guilty, all of the Defendant's right, title, and interest in the Specific Property is hereby forfeited to the United States for disposition in accordance with the law, subject to the provisions of Title 21, United States Code, Section 853.

3. Pursuant to Rule 32.2(b)(4) of the Federal Rules of Criminal Procedure, this Consent Preliminary Order of Forfeiture as to Specific Property/Money Judgment is final as to the Defendant, PABLO RENATO RODRIGUEZ, and shall be deemed part of the sentence of the Defendant, and shall be included in the judgment of conviction therewith.

4. All payments on the outstanding money judgment shall be made by postal money order, bank or certified check, made payable, in this instance, the United States Customs and Border Protection, and delivered by mail to the United States Attorney's Office, Southern District of New York, Attn: Money Laundering and Transnational Criminal Enterprises Unit, One St. Andrew's Plaza, New York, New York 10007 and shall indicate the Defendant's name and case number.

5. Upon entry of this Consent Preliminary Order of Forfeiture as to Specific Property/Money Judgment, and pursuant to Title 21, United States Code, Section 853, United States Customs and Border Protection, or its designee the Office of Fines, Penalties, and Forfeitures shall be authorized to deposit the payment on the Money Judgment in the Treasury Assets Forfeiture Fund, and the United States shall have clear title to such forfeited property

6. Upon entry of this Consent Preliminary Order of Forfeiture as to Specific Property/Money Judgment, the United States Customs and Border Protection, or its designee the Office of Fines, Penalties, and Forfeiture, is hereby authorized to take possession of the Specific Property and to hold such property in its secure custody and control.

7. Pursuant to Title 21, United States Code, Section 853(n)(1), Rule 32.2(b)(6) of the Federal Rules of Criminal Procedure, and Rules G(4)(a)(iv)(C) and G(5)(a)(ii) of the Supplemental Rules for Certain Admiralty and Maritime Claims and Asset Forfeiture Actions, the United States is permitted to publish forfeiture notices on the government internet site, www.forfeiture.gov. This site incorporates the forfeiture notices that have been traditionally published in newspapers. The United States forthwith shall publish the internet ad for at least thirty (30) consecutive days. Any person, other than the Defendant, claiming interest in the Specific Property must file a Petition within sixty (60) days from the first day of publication of the Notice on this official government internet web site, or no later than thirty-five (35) days from the mailing of actual notice, whichever is earlier.

8. The published notice of forfeiture shall state that the petition (i) shall be for a hearing to adjudicate the validity of the petitioner's alleged interest in the Specific Property, (ii) shall be signed by the petitioner under penalty of perjury, and (iii) shall set forth the nature and extent of the petitioner's right, title or interest in the Specific Property, the time and circumstances of the petitioner's acquisition of the right, title and interest in the Specific Property, any additional facts supporting the petitioner's claim, and the relief sought, pursuant to Title 21, United States Code, Section 853(n).

9. Pursuant to 32.2 (b)(6)(A) of the Federal Rules of Criminal Procedure, the Government shall send notice to any person who reasonably appears to be a potential claimant with standing to contest the forfeiture in the ancillary proceeding.

10. Upon adjudication of all third-party interests, this Court will enter a Final Order of Forfeiture with respect to the Specific Property pursuant to Title 21, United States Code, Section 853(n), in which all interests will be addressed. All Specific Property forfeited to the United States under a Final Order of Forfeiture shall be applied towards the satisfaction of the Money Judgment.

11. Pursuant to 21 U.S.C. § 853(p), the United States is authorized to seek forfeiture of substitute assets of the Defendant up to the uncollected amount of the Money Judgment.

12. Pursuant to Rule 32.2(b)(3) of the Federal Rules of Criminal Procedure, the United States Attorney's Office is authorized to conduct any discovery needed to identify, locate or dispose of forfeitable property, including depositions, interrogatories, requests for production of documents and the issuance of subpoenas.

13. The Court shall retain jurisdiction to enforce this Consent Preliminary Order of Forfeiture as to Specific Property/Money Judgment, and to amend it as necessary, pursuant to Rule 32.2 of the Federal Rules of Criminal Procedure.

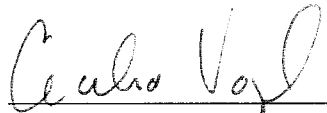
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14. The signature page of this Consent Preliminary Order of Forfeiture as to Specific Property/Money Judgment may be executed in one or more counterparts, each of which will be deemed an original but all of which together will constitute one and the same instrument.

AGREED AND CONSENTED TO:

DAMIAN WILLIAMS
United States Attorney
Southern District of New York

By:


Kiersten A. Fletcher
Samuel Raymond
Cecilia E. Vogel
Assistant U.S. Attorneys
One St. Andrew's Plaza
New York, New York 10007
Tel. No. (212) 637-2238/6519/1084

3/8/23
DATE

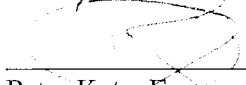
PABLO RENATO RODRIGUEZ

By:


PABLO RENATO RODRIGUEZ

03/08/23
DATE

By:


Peter Katz, Esq.
Attorney for Pablo Renato Rodriguez
116 Village Blvd., 2nd Floor
Princeton, New Jersey 08540
Tel: (609) 531-0027

3/8/23
DATE

SO ORDERED:


HONORABLE GEORGE B. DANIELS
UNITED STATES DISTRICT JUDGE

MAR 08 2023
DATE